

JOINT STATUS REPORT – ADDITIONAL PARTY ATTACHMENT

Additional party name: Genesis Equity Group Funding LLC

☐ Plaintiff ☒ Defendant Other (specify): _____

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?
Unknown at this time
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
Discovery and motion practice
3. When do you expect to complete your discovery efforts?
Unknown at this time
4. What additional discovery do you require to prepare for trial?
Requests for Production of Documents, Requests for Admissions, Interrogatories, subpoenas, depositions of expert and non-expert witnesses, and related third party discovery, as necessary

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?
Unknown at this time, but no less than three to five days
2. How many witnesses do you intend to call at trial (*including opposing parties*)?
Unknown at this time
3. How many exhibits do you anticipate using at trial?
Unknown at this time

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pretrial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Pretrial conference ☒ is ☐ is not requested.

Reasons: Narrow issues for trial

Pretrial conference should be set after (date): _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

The parties are currently engaged in discussions that could potentially resolve this case as against Genesis.

2. Has this dispute been formally mediated?
If so, when?

☐ Yes ☒ No

3. Do you want this matter sent to mediation at this time? ☐ Yes ☒ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

I ☐ do ☒ do not consent to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Pachulski Stang Ziehl & Jones LLP

Printed name of law firm

Victoria A. Newmark

Signature

Victoria A. Newmark

Printed name

Attorney for: Genesis Equity Group Funding LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

700 Louisiana Street Suite 4500, Houston, TX 77002

A true and correct copy of the foregoing document entitled (*specify*): **JOINT STATUS REPORT – ADDITIONAL PARTY ATTACHMENT** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 24, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Joseph Boufadel** jboufadel@salvatoboufadel.com, Gsalvato@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
- **Christopher Ghio** Christopher.Ghio@dinsmore.com, angelica.urena@dinsmore.com
- **Karen Hockstad** karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com;ayrton.celentino@dinsmore.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com, hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com
- **Brian A Paino** bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com
- **Matthew Sommer** matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

7/24/2025

Date

Hope R. Daniels

Printed Name

/s/ Hope R. Daniels

Signature